

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

KEISHA M. BROWN

Bankruptcy Case No. 20-12233-amc

Debtor.

Chapter 13

PRA RECEIVABLES MANAGEMENT,
LLC, servicing agent for PORTFOLIO
RECOVERY ASSOCIATES, LLC,

Movant

vs.

KEISHA M. BROWN

Debtor

And

DERRICK C. JOHNS

Co-Debtor

Respondents.

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

PRA Receivables Management, LLC, servicing agent for Portfolio Recovery Associates, LLC, assignee of American Credit Acceptance, LLC ("Movant"), has filed a Motion with the court for relief from the automatic stay and co-debtor stay pursuant to 11 U.S.C. §§ 362(d) and 1301, and for such other and further relief as to the Court may seem just and proper.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **April 2, 2024**, you or your attorney must do **all** of the following:

- (a) file an objection explaining your position at

United States Bankruptcy Court
Eastern District of Pennsylvania

If you mail your objection to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Jacob Zweig
Evans Petree PC
1715 Aaron Brenner Drive, Suite 800
Memphis, TN 38120

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on Tuesday, April 23, 2024 @ 11:00 AM at Courtroom #4 in Philadelphia at 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 570-831-2500 to find out whether the hearing has been canceled because no one filed an objection.

Dated: March 19, 2024